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August 7, 2024

**VIA ELECTRONIC FILING**

Honorable Wendy A. Kinsella  
United States Bankruptcy Court  
Northern District of New York  
100 South Clinton Street  
Syracuse, New York 13202

In re: *The Roman Catholic Diocese of Syracuse, New York* (Chapter 11 Case  
No. 20-30663 WAK)

Dear Judge Kinsella:

We write in advance of the Section 105(a) conference scheduled by the Court for August 8, 2024 at 1:00 p.m. in order to address certain scheduling issues in connection with revisions to Third Amended Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York [Dkt. No. 1848] (the "Joint Plan") proposed by The Roman Catholic Diocese of Syracuse, New York (the "Diocese") and the Official Committee of Unsecured Creditors (the "Committee") and collectively with the Diocese, the "Plan Proponents") based on the Supreme Court's decision in *Harrington v. Purdue Pharma L.P.*, No. 23-124 (June 27, 2024) ("Purdue").

The Diocese intends to address the letter filed on the docket by Harris Winsberg on behalf of Interstate Fire & Casualty Company and Fireman's Fund Insurance Company ("Interstate") joined by Certain Insurers and Lloyds, London and London Market Companies ("LMI") and together with Interstate, the "Certain Insurers") on July 31, 2024 [Docket No. 2122] requesting that the Court vacate the Court's scheduling order in connection with the confirmation of the Joint Plan.

The Plan Proponents are working diligently to address the *Purdue* guidance while limiting the impact on the Joint Plan provisions. The Diocese and Committee will file their amended Plan and Disclosure Statement, along with redlines showing the modifications, during the week of September 9, 2024. The Plan Proponents' efforts to streamline the revisions will allow for efficiency in the confirmation process in light of the significant

August 7, 2024  
Page 2

discovery and briefing that has already occurred between the Plan Proponents and the Certain Insurers. The Plan Proponents have in the past made significant modifications to the Joint Plan and Disclosure Statement in response to insurer objections and concerns raised at the Disclosure Statement hearings. The Plan Proponents anticipate that any future changes to the Joint Plan will focus on claimant consent and will not materially impact the rights and obligations of the Certain Insurers. As a result, the Diocese does not believe that the modifications to the Joint Plan will warrant any expansion or modification to discovery already undertaken by the parties.

The Plan Proponents will be prepared to discuss this process further at the status conference scheduled for this Thursday, August 8, 2024.

Thank you for your consideration.

Respectfully Submitted,

BOND, SCHOENECK & KING, PLLC

A handwritten signature in blue ink, appearing to read 'S. Donato', with a stylized flourish at the end.

Stephen A. Donato